UNITED STATES DISTRICT COURT DISTRICT OF SOUTH DAKOTA SOUTHERN DIVISION

FILE!
JUN 0 2 2000

UNITED STATES OF AMERICA,

Case Number <u>15-40067</u>

Plaintiff,

INDICTMENT

vs.

SCOTT ROBERT LARSON,

Attempted Commercial Sex

Trafficking

Defendant.

18 U.S.C. §§ 1591 and 1594(a)

The Grand Jury charges:

On or about April 10, 2015, in the District of South Dakota and elsewhere, Scott Robert Larson, defendant herein, knowingly, in and affecting interstate commerce, attempted to recruit, entice and obtain a person who had not attained the age of 18 years, and knew that the person would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, sections 1591 and 1594(a).

FORFEITURE ALLEGATION

- 1. The allegations contained in this indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 1594(d)(1).
- 2. If convicted of an offense set forth above, Scott Robert Larson, the defendant herein, shall forfeit to the United States any and all materials or property used or intended to be used to commit or to facilitate commercial sex trafficking. Such property includes, but is not limited to:

- a. HTC cell phone.
- b. HP laptop computer with charger.
- c. Thumb drive.
- d. \$105.00 United States currency.

A TRUE BILL:

NAME REDACTED

Foreperson

RANDOLPH J. SEILER ACTING UNITED STATES ATTORNEY

By Dennie a. The